

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

Autoscribe Corporation

*Plaintiff,*

v.

Nuvei Corporation, Nuvei Technologies  
Corporation, and Nuvei Technologies, Inc.

*Defendants.*

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Case No.: 2:24-cv-00325

JURY TRIAL DEMANDED

**PLAINTIFF’S UNOPPOSED MOTION FOR LEAVE  
TO CONDUCT EXPEDITED VENUE DISCOVERY**

Pursuant to Federal Rule of Civil Procedure (“Fed. R. Civ. P.”) 26(d)(1), Plaintiff Autoscribe Corporation (“Autoscribe”) hereby moves for leave to conduct limited, expedited venue discovery in this matter. The Parties have conferred, and Defendants Nuvei Corporation, Nuvei Technologies Corporation, and Nuvei Technologies, Inc. (“Nuvei” or “Defendants”) do not oppose this motion. The Parties have also agreed upon much of the scope of venue discovery detailed herein.

On August 15, 2024, Nuvei filed their opposed “Rule 12(B)(2) and 12(B)(3) Motions to Dismiss.” *See* Dkt. No. 15 (“Motion”). While Autoscribe maintains that personal jurisdiction and venue are proper, Nuvei’s Motion disputes them. The proposed discovery is narrowly focused to resolve the Parties’ dispute. The Parties also maintain that good cause exists for the Court to grant this motion, and that it is not brought for any improper purpose, or to unnecessarily delay this action. *Uniloc USA, Inc. v. Apple Inc.*, No. 2:17-CV-00258-JRG, 2017 U.S. Dist. LEXIS 126523, at \*3 (E.D. Tex. July 21, 2017) (granting motion for expedited venue discovery); *Blitzsafe Tex. LLC v. Mitsubishi Elec. Corp.*, No. 2:17-CV-00430-JRG, 2019 U.S. Dist. LEXIS 86350, \*15 (E.D.

Tex. May 22, 2019) (allowing plaintiff to serve document requests and 30(b)(6) deposition notices). Accordingly, Autoscribe requests that the Court exercise its broad discretion to allow Autoscribe to conduct limited, expedited venue-related discovery, and stay the due date for Autoscribe's Response to Defendants' Motion as follows:

1. Venue related discovery shall be limited to the issues raised in Nuvei's Motion (Dkt. No. 15) and exhibits/declaration, and evidence necessary for Autoscribe's response to Nuvei's Motion;
2. Autoscribe may serve no more than (8) interrogatories and eight (8) document requests to Nuvei by August 30, 2024;
3. Nuvei shall respond to Autoscribe's discovery requests and produce responsive documents, if any, by October 14, 2024;
4. Autoscribe's Response to the Venue Motion (Dkt. No. 15) shall be filed by November 4, 2024;
5. Nuvei may file a Reply on or before November 18, 2024; and
6. The foregoing discovery shall not count toward the discovery limits set forth in the Court's forthcoming Discovery Order.

Dated: August 29, 2024

Respectfully submitted,

/s/ Jason McManis

Jason McManis (SBN# 24088032)

Colin Phillips (SBN# 24105937)

Chun Deng (SBN# 24133178)

Angela Peterson (SBN# 24137111)

Michael Killingsworth (SBN# 24110089)

Ahmad, Zavitsanos & Mensing, PLLC

1221 McKinney Street, Suite 2500

Houston, Texas 77010

(713) 655-1101

jmcmanis@azalaw.com

cphillips@azalaw.com

cdeng@azalaw.com

apeterson@azalaw.com

mkillingsworth@azalaw.com

Andrea L. Fair (SBN# 24078488)

Ward, Smith, & Hill, PLLC

1507 Bill Owens Parkway

Longview, Texas 75604

(903) 757-6400

(903) 757-2323 (fax)

andrea@wsfirm.com

*Attorneys for Autoscribe Corporation*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on August 29, 2024, a true and correct copy of the foregoing document was served via electronic delivery to all counsel of record.

/s/ Jason McManis

Jason McManis

**CERTIFICATE OF CONFERENCE**

The parties met and conferred on August 28, 2024, to discuss the relief requested in this Motion. This Motion is unopposed.

/s/ Jason McManis

Jason McManis